

1 Margolin & Lawrence, Attorneys at Law
2 Allison B. Margolin (SBN 222370)
3 J. Raza Lawrence (SBN 233771)
4 Jennie W. Stepanian (SBN 289371)
5 8484 Wilshire Blvd., Suite 440
6 Beverly Hills, CA 90211
7 Telephone: (323) 653-9700
8 Facsimile: (310) 919-0448

9 Attorneys for Plaintiffs

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

Dilevon Lo, Jerry Vang, Nathan Thao, Mao
Thao, Pao Lee, and Antonio Lee,

Plaintiffs,

v.

County of Siskiyou; Jeremiah LaRue and
Jesus Fernandez, in their official capacities as
members of the Siskiyou County Sheriff's
Department and in their individual capacities;
and Brandon Criss, Ed Valenzuela, Michael
N. Kobseff, Nancy Ogren, and Ray A. Haupt,
in their official capacities as members of the
Siskiyou County Board of Supervisors and in
their individual capacities; Edward Kiernan,
in his official capacity as County Counsel for
Siskiyou County and in his individual
capacity; and DOES 1-100,

Defendants.

Case No.:

**DECLARATION OF COUNSEL
REGARDING NOTICE OF EX PARTE
APPLICATION AND BRIEFING
SCHEDULE PROVIDED TO SISKIYOU
COUNTY COUNSEL**

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3 **DECLARATION OF J. RAZA LAWRENCE**
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5 I, J. RAZA LAWRENCE, declare:

6 1. I am an attorney admitted to practice before the United States District Court for the
7 Eastern District of California. I am one of the attorneys representing the plaintiffs in this
8 case.

9 2. On May 26, 2021, I contacted the county counsel of Siskiyou, California by telephone.
10 I told the receptionist that I would like to speak with the appropriate person in the office
11 regarding filing a request for a temporary restraining order and preliminary injunction
12 involving a county ordinance, and was referred to attorney William (Bill) Carroll who
13 informed me he was the correct individual to speak with about this matter. I gave Mr.
14 Carroll notice that we intended to file, at the U.S. District Court for the Eastern District of
15 California, Sacramento Courthouse, an *ex parte* request for a TRO and preliminary
16 injunction seeking to stop enforcement of the water truck ban that the Siskiyou County
17 Board of Supervisors passed on May 4, 2021, and that we would provide him with any
18 documents that we filed on the matter.

19 3. On June 5, 2021, at 12:07 a.m., paralegal Zachary Tucker of my law firm emailed Mr.
20 Carroll, of the Siskiyou County Counsel's office, copies of the Complaint, Ex Parte
21 Application for a Temporary Restraining Order, and all supporting declarations and other
22 documents that my law office filed in this case on the evening of June 4, 2021.

23 4. On June 7, 2021, at 8:50 a.m., I emailed Mr. Carroll a copy of the Minute Order that we
24 received from the Court on this case on June 7, 2021, at 7:50 a.m., setting forth the briefing
25 schedule for the plaintiffs' pending *ex parte* application for a temporary restraining order,
26 and requesting that he contact me with any questions.

27 5. On June 7, 2021, at 9:30 a.m., I called the Siskiyou County Counsel's office and asked to
28 speak with Mr. Carroll to confirm that he received the documents and briefing schedule that
we had sent him. The receptionist at the County Counsel's office informed me that Mr.

1 Carroll was currently working from home, and that she would relay my message to him and
2 ask him to call me with any questions.
3

4 I hereby declare under penalty of perjury the above matters are true and correct.

5 Executed on this 7th day of June, 2021, in Los Angeles, California.
6

7 June 7, 2021

Respectfully submitted,

8 /s/ J. Raza Lawrence

9 Attorney for Plaintiffs
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